



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
Attorney General

DIVISION OF SOCIAL JUSTICE
Environmental Protection Bureau

December 18, 2024

BY CM/ECF

The Honorable Lewis J. Liman
United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Chan v. U.S. Department of Transportation*
No. 1:23-cv-10365-LJL
Mulgrew v. U.S. Department of Transportation
No. 1:24-cv-01644-LJL

Dear Judge Liman:

We write on behalf of Stephanie Winkelhake, defendant in the two above-referenced cases. Earlier today, defendants Metropolitan Transportation Authority and Triborough Bridge and Tunnel Authority (collectively, “MTA/Triborough”) filed reply briefs in further support of their summary judgment cross-motions [*Chan* ECF No. 161; *Mulgrew* ECF No. 147]. Ms. Winkelhake had previously joined those cross-motions and now joins the MTA/Triborough reply briefs.

Respectfully submitted,

/s/ Andrew G. Frank

Andrew G. Frank
Assistant Attorney General

c: All counsel of record (by CM/ECF):